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10 *Attorneys for Defendant State of California,
acting by and through the California Highway
Patrol (erroneously sued as "State of California")
and Michael Bell*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

16
17 **EDGAR SOLIS,**

18 Plaintiff,

19 v.

20 **COUNTY OF RIVERSIDE; STATE
21 OF CALIFORNIA; SALVADOR
WALTERMIRE; and DOES 1-10,
22 inclusive,**

23 Defendants.

5:23-cv-00515-HDV-JPR

**DEFENDANTS' SECOND
AMENDED WITNESS LIST**

Date: February 18, 2025
Time: 9:00 a.m.

Courtroom: 10D

Judge: The Honorable Hernan
D. Vera

Trial Date: February 18, 2025
Action Filed: 2/02/2023

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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**
23 Defendants State of California, acting by and through the California Highway
4 Patrol, and Michael Bell hereby serve the following list of witnesses who may be
5 called during trial. Defendants reserve the right to supplement or amend this list.
6

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Michael Bell, Defendant, CHP Officer	Officer Bell is the defendant and will testify about his interactions with Plaintiff, training and experience with the CHP.	1.25		
M. Vargas, Lieutenant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Operations. Involved in post-shooting investigation and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
D. Harris, Sergeant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Sergeant and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
C. Hamilton, Lieutenant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Leader. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	1 hour	1 hr	
J. Kawanaka, Sergeant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Lead Administrative Investigator. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	45 minutes	45 min	

1	Witness's Name*, Title, Affiliation (If Relevant)	2	Summary of Testimony/Why Testimony is Unique	3	Direct Exam (Hours)	4	Cross Exam (Hours)	5	Dates of Testimony
6	Daniel Moody, Detective	7	Riverside County Sheriff Department involved in the subsequent scene control or incident investigation and plaintiff's blood sample.	8	45 minutes	9	45 min	10	
11	J. Manjarrez, Detective	12	Riverside County Sheriff Department officials. Collected white bag of powdery substance from plaintiff's car suspected fentanyl and blood sample.	13	30 minutes	14	30 min	15	
16	A. Ditfurth, Deputy	17	Riverside County Sheriff Department official involved in the incident investigation. Surveillance video from 642 Taschner Drive and plaintiff's firearm forensic analysis.	18	30 minutes.	19	30 min	20	
21	Daniel Cline, Deputy	22	Riverside County Sheriff Department official involved in the incident investigation, obtained pictures, DNA swab, and Scanner data.	23	20 minutes	24	20 min	25	
26	Jennifer Jernegan, Lead Forensic Evidence Supervisor	27	Riverside County Sheriff Department officials involved in the incident investigation.	28	20 minutes	29	20 min	30	
31	Yesika Alvarado, Forensic Evidence Technician	32	Riverside County Sheriff Department official involved in the incident investigation. Captured pictures of scene, bullet holes and charted plaintiff's firearm.	33	40 minutes	34	40 min	35	

1	Witness's 2 Name*, Title, 3 Affiliation (If 4 Relevant)	5 Summary of 6 Testimony/Why 7 Testimony is Unique	8 Direct 9 Exam 10 (Hours)	11 Cross 12 Exam 13 (Hours)	14 Dates of 15 Testimony
1	A. Carey, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of scene and plaintiff in hospital and first aid supplies and clothing.	20 minutes	20 min	
2	Venderfees, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of pursuit termination at 632 Taschner Drive and point of rest of plaintiff's car and carport damage.	20 minutes	20 min	
3	Esteban Carranza, Investigator	Riverside County District Attorney's Investigator involved in the criminal investigation of the incident.	30 minutes	30 min	
4	J. Gonzalez, Lieutenant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent scene control or incident investigation.	30 minutes	30 min	
5	D. Maddox, Sergeant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent incident investigation.	30 minutes	30 min	
6	G. Gomez, Detective	Hemet Police Department Officer involved in the incident investigation.	20 minutes	20 min	
7	Kristen Steward, M.S., D-ABFT-FT	Bio-Tox Laboratories Personnel involved in the testing and	30 minutes	30 min	

1	Witness's 2 Name*, Title, 3 Affiliation (If 4 Relevant)	5 Summary of 6 Testimony/Why 7 Testimony is Unique	8 Direct 9 Exam 10 (Hours)	11 Cross 12 Exam 13 (Hours)	14 Dates of 15 Testimony
1	or 2 Erin Crabtree, 3 MS., D- 4 ABFT-FT- 5 Laboratory 6 Director	7 analysis of blood 8 obtained from 9 Plaintiff.	10	11	12
13	14 Greg Meyer, 15 Captain (Ret.)	16 Police Practices 17 Expert will explain 18 POST standards from 19 basic law enforcement 20 training and use of 21 force tactics 22 applicable to facts of 23 this case.	24 2 hours	25 1 hr, 15 26 min – 1 hr 27 30 min	28
29	30 Parris Ward, 31 Forensic 32 Video Analyst	33 Forensic video/audio 34 analyst. Will testify 35 regarding his 36 assessment of BWC 37 footage and security 38 cameras near the 39 shooting location and 40 information that can 41 be derived in relation 42 to incident shooting.	43 1 hour	44 45 min	45
46	47 Ronald 48 Kvitne, M.D.	49 Board certified 50 orthopedic surgeon 51 medical expert will 52 testify about his 53 review and analysis of 54 plaintiff's medical 55 records as they pertain 56 to Plaintiff's injuries 57 including further 58 treatment.	59 45 minutes	60 30-40 min	61
62	63 Michael 64 Ritter, M.D.	65 Emergency Medicine 66 expert will testify 67 about his review and 68 analysis of plaintiff's 69 Toxicology drug 70 results positive for 71 methamphetamine and 72 PCP and other 73 medical records 74 pertaining to 75 Plaintiff's injuries.	76 1 hour	77 45 min	78
79	80 Leslie 81 Martinez	82 Resident of the 83 property where the 84 incident occurred who	85 20 minutes	86 20 min	87

1	Witness's 2 Name*, Title, 3 Affiliation (If 4 Relevant)	5 Summary of 6 Testimony/Why 7 Testimony is Unique	8 Direct 9 Exam 10 (Hours)	11 Cross 12 Exam 13 (Hours)	14 Dates of 15 Testimony
3		4 heard yelling and 5 gunshots.			
4	5 Marlene Sue 6 Biggs	7 Resident who 8 observed 2-3 officers 9 chase a male adult and 10 heard gunshots	20 minutes	20 min	
6	7 Jose Jesus 8 Rodriguez	9 Resident who heard 10 gunshots and heard 11 suspect run through 12 property perimeter 13 and the officer 14 chasing after him. 15 Heard shouting and 16 the words "He's got a 17 gun" followed by 18 numerous gunshots	20 minutes	20 min	
11	12 Ana 13 Rodriguez	14 Resident who heard 15 gunshots and heard 16 suspect run through 17 property perimeter 18 and the officer 19 chasing after him. 20 Heard shouting and 21 the words "He's got a 22 gun" followed by 23 numerous gunshots	20 minutes	20 min	
16	17 Liliana 18 Rodriguez	19 Resident who heard 20 gunshots and heard 21 suspect run through 22 property perimeter 23 and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
21	22 Pearo 23 Rodriguez	24 Resident who 25 provided surveillance 26 video from camera 27 mounted to front of 28 residence	20 minutes	20 min	
24	25 Florina Maria 26 Mandujano	27 Resident who 28 provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
27	28 Thomas Jordan	Resident who provided surveillance video from camera mounted to front of	15 minutes	15 min	

1 2 3 4 5 6 7 8 9 10 11 12 13 14	Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
		residence			
Richard Contla	Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, "He's got a gun" followed by numerous gunshots and shouting. Mr. Contla recognized suspect, having seen him in the area before the incident.	30 minutes	30 min		
Kathy Lynn Cassel	Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min		

15 Dated: January 23, 2025

Respectfully submitted,

16 ROB BONTA
17 Attorney General of California
18 DONNA M. DEAN
19 Supervising Deputy Attorney General
20 DAVID KLEHM
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22 TAMMY KIM
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24
25 s/ Donna M. Dean

26 *Attorneys for Defendants State of
27 California, acting by and through the
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California") and Michael Bell*

*Indicates that witness will be called only if the need arises.